

Sprint

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November 7, 2005

Chairman Ron Jones
Tennessee Regulatory Authority
460 James Robertson Parkway
Nashville, Tennessee 37243-0505

Re: Sprint Nextel Corporation's Motion to Adopt Procedural Schedule
Docket No. 05-00240

Dear Chairman Jones:

Enclosed for filing are the original and thirteen (13) copies of Sprint Nextel Corporation's Motion to Adopt Procedural Schedule in the above-referenced docket.

Please do not hesitate to contact me if you have any questions concerning this request.

Sincerely yours,



Edward Phillips

HEP:sm

Enclosures

BEFORE THE TENNESSEE REGULATORY AUTHORITY
NASHVILLE, TENNESSEE

In the Matter of:)	
)	
Application of Sprint Nextel Corporation)	
for Approval of the Transfer of Control of)	
United Telephone-Southeast, Inc., Sprint)	Docket No. 05-00240
Long Distance, Inc. and Sprint Payphone)	
Services, Inc. From Sprint Nextel)	
Corporation to LTD Holding Company.)	

Sprint Nextel Corporation's Motion to Adopt Procedural Schedule

Sprint Nextel Corporation ("Sprint Nextel") through undersigned counsel respectfully submits this Motion to Adopt Procedural Schedule ("Motion"). As support for its Motion, Sprint Nextel demonstrates the following:

- 1) On August 24, 2005, Sprint Nextel filed with the Tennessee Regulatory Authority ("Authority") its Application for Approval of the Transfer of Control of United Telephone-Southeast, Inc., Sprint Long Distance, Inc. and Sprint Payphone Services, Inc. from Sprint Nextel Corporation to LTD Holding Company ("Application"). The Application was filed pursuant to the requirements of Tenn. Code Ann. § 65-4-113;
- 2) Sprint Nextel's Application has been pending before the Authority since August 24, 2005;
- 3) On September 29, 2005, thirty-seven (37) days after Sprint Nextel filed its Application, the Communication Workers of America ("CWA") filed a Petition for Leave to Intervene ("request for intervention"). On October 6, 2005, seven (7) days after the CWA filed its request for intervention, Sprint Nextel filed its response opposing CWA's request. Eighteen

(18) days later, on October 24, 2005, the CWA filed its Reply to the Response of Sprint Nextel Corporation and LTD Holding Company to the Petition of Communication Workers of America, AFL-CIO for Leave to Intervene ("CWA Reply");

4) On September 2, 2005, the Authority Staff served Data Requests No. 1 on Sprint Nextel concerning its Application for Transfer of Control. Sprint Nextel responded to that data request on September 12, 2005;

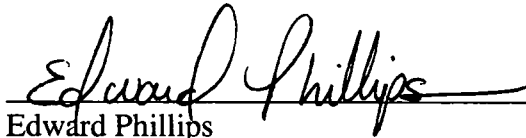
5) As a result of filings made by the CWA, the Authority Staff served upon Sprint Nextel Data Request No. 2 on October 26, 2005, with responses being due by November 4, 2005. Sprint Nextel filed a redacted version of its responses to Staff Data Request No. 2 on November 1, 2005;

6) On November 7, 2005, the panel of Directors assigned to this matter granted the CWA's petition to intervene. It is important to note that in the CWA Reply, the CWA stated that its participation in this matter would "not stall this proceeding." See CWA Reply at p. 5; and

7) Since it is Sprint Nextel's desire that this matter move forward, and since the CWA has stated that this proceeding should not be "stalled" because of its participation, Sprint Nextel respectfully requests that the Authority adopt the procedural schedule attached hereto as Exhibit A.

WHEREFORE, Sprint Nextel respectfully requests that the Authority adopt the attached Procedural Schedule so that this matter may proceed to a swift conclusion.

Respectfully submitted this 7th day of November, 2005.

A handwritten signature in cursive script, reading "Edward Phillips", is written over a horizontal line.

Edward Phillips
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Southeast, Inc., Sprint Long Distance, Inc., and
Sprint Payphone Services, Inc.
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CERTIFICATE OF SERVICE

I hereby certify that I have served a copy of Sprint Nextel Corporation's Motion to Adopt Procedural Schedule upon counsel for Communications Workers of America, AFL-CIO by depositing a copy in the United States Mail, first-class postage prepaid.

This 7th day of November, 2005.

Donald L. Scholes
Branstetter, Kilgore, Stranch & Jennings
227 Second Avenue North, Fourth Floor
Nashville, TN 37219



Edward Phillips
United Telephone-Southeast, Inc.

Exhibit A

November 7, 2005	The Authority or appointed Hearing Officer enters the Proposed Protective Order and rules on any pending interventions;
November 10, 2005	Sprint files direct testimony (public and highly confidential versions). Discovery begins. All discovery requests shall be filed in writing with the TRA and served on all parties. Responses and objections to discovery are due within 10 calendar days of the date served.
December 2, 2005	Rebuttal testimony filed;
December 23, 2005	Sprint Nextel files surrebuttal testimony;
January 6, 2006	Discovery period ends. Responses to any written discovery requests filed on January 6, 2006 are to be filed on January 16;
January 18, 2006	Pre-hearing conference to resolve any outstanding issues prior to hearing; and
January 24 - 25, 2006	Hearing on the merits followed immediately by closing argument. No post-hearing briefs to be filed by any of the parties.